1 GRANT WOODS Attorney General SYLVIĂ E. GOODWIN 2 Assistant Attorney General CLERK SUPERIOR CO 3 400 West Congress, Suite S-315 Tucson, Arizona 85701 Telephone No.: (520) 628-6504 4 Pima County Computer No: 21393 5 State Bar No: 12485 OCI97-1082 6 7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA 8 IN AND FOR THE COUNTY OF COCHISE CASE No. CR98000550 STATE OF ARIZONA, 9 GJ No. <u>9</u>8-0576 10 Plaintiff, 11 INDICTMENT JANICE L. WILSON. 12 [DR#1997-046527] 13 Defendant. 14 The grand jurors of the County of Cochise, in the name of the State of Arizona, and by 15 its authority accuse JANICE L. WILSON and charge that in Cochise County: **COUNT ONE:** 17 FRAUDULENT SCHEME AND ARTIFICE Class Two Felony 18 Between May, 1994, and March, 1995, JANICE L. WILSON, pursuant to a scheme or artifice to defraud, obtained a benefit from VERA LEWIS and the estate of Lloyd Lewis, by means of 20 false or fraudulent pretenses, representations, promises or material omissions. In violation of A.R.S.§§ 13-2310; 13-603; 13-701; 13-702; 13-801; 13-804; and 13-811. 21 **COUNT TWO:** 22 FRAUDULENT SCHEME AND ARTIFICE Class Two F&L 23 On or about the 28th day of January, JANICE L. WILSON, pursuant to a scheme or artifice to 24 defraud, obtained a benefit from DANIEL LEWIS, by means of false or fraudulent pretenses, 25 representations, promises or material omissions. In violation of A.R.S.§§ 13-2310; 13-603; 13-701; 13-702; 13-801; 13-804; and 13-811. 26 27

28

1-3

FINANCIAL EXPLOITATION OF A VULNERABLE ADULT **COUNT THREE:** Class Two Felony 2 Between May, 1994, and March, 1995, JANICE L. WILSON, in a position of trust and 3 confidence for VERA LEWIS, a vulnerable adult, and the estate of Lloyd Lewis, knowingly controlled the assets of VERA LEWIS and the estate of Lloyd Lewis with the intent to 4 permanently deprive VERA LEWIS and the estate of Lloyd Lewis of money having a value of approximately \$56,000.00. 5 In violation of A.R.S. §§ 46-456; 13-1802(A), (2) and (D) and/or (3) and (C); 13-603; 13-701; 6 13-702; 13-801; 13-804; 13-811; 13-2313; and 13-2314. 7 FINANCIAL EXPLOITATION OF A VULNERABLE ADULT **COUNT FOUR:** 8 Class Three Felony 9 On or about the 28th day of January, 1995, JANICE L. WILSON, in a position of trust and 10 confidence for DANIEL LEWIS, a vulnerable adult, knowingly controlled the assets of DANIEL LEWIS with the intent to permanently deprive DANIEL LEWIS of money having a value of 11 approximately \$4,600.00. 12 In violation of A.R.S. §§ 46-456; 13-1802(A), (2) and (D) and/or (3) and (C); 13-603; 13-701; 13-702; 13-801; 13-804; 13-811; 13-2313; and 13-2314. 13 14 TRUE BILL, 15 ALAN K. POLLEY COCHISE COUNTY ATTORNEY 16 17 18 Foreperson of the Grand Jury By: Assistant Attorney General 19 20 Dated 12-18-98

21

22

23

24

25

26

27

28